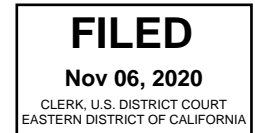


UNITED STATES DISTRICT COURT

for the
Eastern District of California



United States of America
v.

DESIREE BRIANNA SANCHEZ and
RICHARD BELDON WATERS III

Case No. 2:20-mj-0174-KJN

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2020 through August 2020 in the county of Sacramento County in the
Eastern District of California, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 371 – Conspiracy

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/ Patrick Mahoney

Complainant's signature

Postal Inspector Patrick Mahoney
United States Postal Inspection Service

Printed name and title

Sworn to me and signed telephonically.

Date: November 6, 2020

City and state: Sacramento, California

KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Patrick Mahoney, being duly sworn, depose and state the following:

PURPOSE

1. I make this affidavit in support of a criminal complaint and arrest warrants for DESIREE BRIANNA SANCHEZ (date of birth XX/XX/1993) and RICHARD BELDON WATERS III (date of birth XX/XX/1992) for a violation of 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States, wherein such offenses include theft of U.S. Mail and possession of stolen U.S. Mail in violation of 18 U.S.C. § 1708, and making and possession of counterfeit U.S. Postal Service keys in violation of 18 U.S.C. § 1704, during the time period of approximately April 2020 through August 2020.

INTRODUCTION AND AGENT BACKGROUND

2. I am a Postal Inspector and have been so employed since April 2005. Currently, I am assigned to the San Francisco Division of the United States Postal Inspection Service (USPIS), and I work out of the Sacramento office. During my tenure, I completed training at the United States Postal Inspection Service Academy in Potomac, MD. As a part of my official duties, it is my responsibility to investigate violations of federal and state law, including robbery and burglary of postal facilities, destruction of government property, theft of U.S. Mail, possession of stolen U.S. Mail, mail and bank fraud, credit card fraud, identity theft, and counterfeit personal checks and identifications. As a U.S. Postal Inspector, I have participated in numerous criminal investigations relating to theft of U.S. Mail, counterfeit personal and corporate checks, possession of stolen U.S. Mail, credit application fraud, bank fraud, identity theft, and counterfeit identifications.
3. The facts and conclusions in this affidavit are based on my personal knowledge gained from my participation in this investigation, my training and experience, and information gained from other inspectors, agents, local law enforcement, and field contacts and reports. Since this affidavit is submitted for the limited purpose of obtaining arrest warrants, I have not included all of the facts of which I am aware in this investigation.

4. Where statements made by other individuals are referenced in this Affidavit, such statements are described in sum and substance and in relevant parts only. Similarly, where information contained in reports and other documents or records is referenced in this Affidavit, such information is also described in sum and substance and in relevant parts only.
5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Sanchez and Waters have violated or aided and abetted violations of 18 U.S.C. § 371 – Conspiracy; § 1708 – Possession of Stolen U.S. Mail; § 1704 – Possession of Stolen or Counterfeit Postal Keys or Locks; § 1028A – Identity Theft; and § 1343 – Wire Fraud.
6. The USPS is investigating a criminal scheme that began at a time unknown to the United States but at least as early as April 2020 and is currently on-going, wherein the subjects – including Sanchez, Waters, and other coconspirators – devised a material scheme to defraud, and attempt to defraud, via wire and other means automobile dealerships in the Eastern District of California and elsewhere. The subjects executed and aided and abetted the scheme by obtaining, rifling, profiling, and altering identification and financial information from stolen U.S. Mail and from other stolen property containing identification and financial information. The subjects catalogued, saved, and possessed the stolen mail and property. In processing the stolen mail and property, the subjects targeted certain postal customers and mail receptacles utilized by those customers (postal victims). The subjects further executed the scheme by posing as identity-theft victims to purchase and obtain automobiles and other property in the victims' names.

STATEMENT OF PROBABLE CAUSE

Overview

7. On May 11, 2020, I received information from Folsom Police Department (FPD) Detective Gavin Plank regarding the arrest of Sanchez and Waters for being in possession of stolen U.S. Mail and a stolen vehicle.

8. On May 11, 2020, FPD conducted a probable cause arrest of Sanchez and Waters for being in possession of a stolen vehicle. During the arrest, Sanchez and Waters were contacted in the vicinity of the stolen vehicle while in possession of the keys for the vehicle. Also recovered in the area of Sanchez and Waters was a room key for the hotel where the stolen automobile was parked. Waters was found to be on Post Release Community Supervision (PRCS), which included search conditions of his residence, and Sanchez was determined to be on state searchable probation with Contra Costa County Probation. FPD conducted a PRCS/probation search of the hotel room associated with Sanchez and Waters, as well as the stolen vehicle, and found U.S. mail that did not belong to Sanchez or Waters.
9. FPD arrested Sanchez and Waters on the following charges: PC 530.5 C(3) – Possession of Stolen Mail; PC 10851 VC – Possession of a stolen vehicle; PC 496 – Possession of Stolen Property; PC 182– Conspiracy. Waters was also charged with PC 3056 – Parole Hold. Sanchez and Waters later bailed out of state custody.
10. On May 18, 2020, the El Dorado County Sheriff's Office (EDSO) received a report of multiple individuals filling bags with mail from a cluster mail box located at 2200 Valley View Parkway, El Dorado Hills, CA. The suspect vehicle was described as a dark colored Audi. EDSO conducted an investigative vehicle stop of a dark colored Audi located in the area. The driver of the vehicle, later identified as Desiree Sanchez, falsely identified herself as victim J.M., and the front passenger, later identified as Richard Waters, falsely identified himself as Gary Waters. In the back passenger seat of the vehicle, an individual identified himself as R.J. EDSO observed mail and packages in plain view inside the vehicle and conducted search that yielded multiple pieces of U.S. mail in names other than the occupants of the vehicle and two counterfeit U.S. Postal keys.
11. EDSO arrested Waters on the following charges: PC 530.5 – False Presentation for Personal Gain and PC 182 – Conspiracy. EDSO arrested Sanchez on the following charges: PC 530.5 – False Presentation for Personal Gain; PC 182– Conspiracy and 529

PC – Using Another Person’s Identification Information. Sanchez and Waters later bailed out of state custody.

12. In a filed Affidavit for search warrant 2:20-SW-0523 (E.D. Cal.), I established probable cause to believe that a cellphone recovered during the EDSO search contained evidence of Sanchez and Waters’ possession of stolen mail, possession of counterfeit U.S.P.S. keys, and commission of identity theft. During a subsequent search of the phone, I identified additional evidence of mail theft, identity theft, bank fraud, and wire fraud perpetrated by Sanchez, Waters, and others.
13. In August 2020, Sanchez and Waters were arrested in Sonoma County after a traffic stop near a Fairmont Hotel. A subsequent PRCS/probation search of their hotel room uncovered additional stolen mail, counterfeit U.S. Postal Service keys, U.S. Postal Service locks, counterfeit IDs, stolen bank cards, stolen checks, and notebooks containing the personally identifiable information (PII) of identity-theft victims.
14. In sum, the evidence summarized below shows that Sanchez and Waters have engaged in a rampant mail and identity theft spree throughout several counties in Northern California and have been undeterred by serial arrests by state law enforcement. The subjects have also used stolen PII, financial information, and financial instrumentalities to commit fraud. Given their significant criminal histories at relatively young ages, I believe their alleged criminal conduct is likely to continue without federal intervention. Their alleged crimes have already had significant impacts on mail theft, identity theft, and fraud victims and have likely corroded public confidence in the U.S. Postal Service system.

Sacramento Police Department Report 20-137575

15. On May 7, 2020, victim T.B. reported to law enforcement the theft of an Infiniti G35 with California license plate 7HEK402.
16. On May 1, 2020, a female suspect that identified herself as identity-theft victim A.J. entered the Queens Auto Sales in Sacramento to purchase the Infiniti. The suspect advised she was preapproved for an auto loan through Westlake Financial Services.

Because of this preapproval, the car sale was done through T.B.'s spouse V.B.'s dealership, Apex Motor Group LLC for \$9,380.25. The suspect provided a copy of California Driver's License D5025991 in the name of victim A.J. with DOB XX-XX-1985 and an address in Pittsburg, CA at the time of purchase. Law enforcement later identified Sanchez as the individual pictured in the provided driver's license. Also provided at the time of purchase was a Progressive Auto Insurance document in the name of victim A.J. for a 2017 Audi A4 VIN ending x41413. West Lake Financial Services issued the loan for the Infiniti.

17. During a subsequent investigation, I determined that West Lake Financial runs credit checks of customers through Experian using an electronic wire.
18. Law enforcement conducted a records search for a 2017 Audi A4 with the VIN ending x41413. The records search revealed the VIN ending x41413 was associated with a 2017 Lexus that was purchased on April 6, 2020, from Steven Creek Chevrolet in San Jose, CA. The name used to make the purchase was M.D. who reported and address in Pittsburg, CA that was the same as the address that Sanchez provided on her counterfeit driver's license on May 1. Steven Creek Chevrolet reported that this purchase was fraudulent. M.D. was later identified as C.R., who was a known associate of Sanchez. The phone number (925) 354-9287 was also provided at the time of purchase.

Folsom Police Department Report 20-1496

19. On May 11 2020, FPD was alerted to the stolen Infiniti G35 (7HEK402) in the city of Folsom, CA. Law enforcement identified the vehicle in the parking lot of the Marriott Residence Inn located at 2555 Iron Point Rd., Folsom, CA. Law enforcement contacted Sanchez and Waters approximately four parking spots from the Infiniti. Sanchez admitted she had the keys to the Infiniti. Law enforcement also located a hotel room key in the area where Sanchez was detained. Sanchez reported the key was for Room 208, allegedly registered in her mother's name.

20. Law enforcement confirmed Sanchez was on California state searchable probation through 2023 and Waters was on CDCR parole until March 30, 2023. Law enforcement searched the Infiniti and found paperwork belonging to Waters and female clothing.
21. Law enforcement also conducted a probation/parole search of Room 208 of the Marriott Residence Inn and recovered the following items: a Bank of America debit card in the name of victim J.M., a Chase Visa debit card in the name of victim C.T., an interim driver's license in the name of victim A.G., a Dell Laptop, over 300 pieces of mail in names other than Sanchez and Waters, and an interim driver's license in the name of M.F.-Sanchez. Law enforcement observed that all of the recovered interim driver's licenses recovered from Room 208 depicted the same photograph of Sanchez in the top right corner.
22. Law enforcement contacted victim T.B. of Queens Auto and he/she reported a male and a female entered the dealership and were looking at the Infiniti G35. The female identified herself as victim A.J. and provided a driver's license, insurance card, and paystub.

El Dorado County Sheriff's Department Report 20-3875

23. On May 18, 2020, El Dorado County Sheriff's Department (EDCS) received a report of multiple individuals filling bags with mail from a cluster mailbox. The suspect vehicle was reported as a dark colored Audi. During the response to 2200 Valley View Parkway, El Dorado Hills, CA, EDCS observed a dark colored Audi come to a stop in front of 2200 Valley View Parkway. Law enforcement conducted an investigative stop of the Audi with California license plate 7XPY170 at the intersection of Valley View Parkway and White Rock Road.
24. A female, later identified as Sanchez, was the driver of the vehicle; a male passenger, later identified as Waters, was seated in the front passenger seat; and suspect R.J. was located in the rear of the vehicle seated behind the driver. Sanchez initially identified herself as victim J.M. and claimed to live in Folsom, and Waters initially identified himself as Gary Waters.

25. EDCS observed multiple pieces of mail and packages in the Audi. After this observation, law enforcement removed the Audi occupants and conducted a search. EDCS then found multiple pieces of mail in different names inside the Audi and five large trash bags of mail in the Audi's trunk. Some of the mail recovered was addressed to various apartments at 2200 Valley View Parkway. The mail recovered from the trunk of the vehicle was not addressed to any of the occupants. EDCS also recovered a counterfeit U.S. Postal Service arrow key from the front passenger door and another such key from the center console between the driver and passenger seats. Based on my training and experience, I know that such keys are used by individuals to illegally access mailboxes in cluster mailboxes throughout a particular neighborhood or region. Below is a photo of the counterfeit U.S.P.S. arrow keys recovered from the Audi:



26. Sanchez claimed her sister A.G. had recently leased the vehicle. EDCS searched Sanchez's purse incident to arrest and found a photocopied driver's license in the name of A.G. with the date of birth of X/XX/1994, a debit/credit card in the name of A.F., and an interim driver's license in the name of A.G. EDCS also recovered a cellphone.
27. Law enforcement contacted the witness that reported the mail theft at the apartment complex located at 2200 Valley View Parkway. The witness observed two white male adults opening the cluster mailboxes and stuffing mail into sacks. Then the males placed the sacks into a black Audi sedan with a third person driving the vehicle.

28. Law enforcement inspected the cluster mailboxes that the witnesses described as the location of the theft and found the boxes to be locked and undamaged. Based on my training and experience, I believe that this evidence showed that the cluster mailboxes must have been opened by a U.S.P.S. arrow key—either an official key or a counterfeit one.

Colma Police Department Report C-20-0518-01

29. On May 18, 2020, Honda of Serramonte Sales Manager O.B. reported to law enforcement that the black Audi A4 (7XPY170) was stolen. This license plate matched the plate of the above-described Audi stopped in El Dorado Hills. O.B. advised that someone attempted to purchase the vehicle online and requested it be delivered to an address in Lodi, CA. This request was denied due to the delivery location being outside of distance parameters. O.B. also advised that the main sales representatives were Z.A. and Y.W.
30. On May 17, 2020, a female who identified herself as victim A.G., arrived at Honda of Serramonte, located at 485 Serramonte Blvd., Colma, CA to purchase the Audi A4 (7XPY170). She provided California driver's license F1838883 in the name of victim A.G. and additional documentation to purchase the vehicle.
31. Sales representative Y.W. advised that the female was in a hurry to make the purchase and that she presented a \$4,500 check at the time of purchase.
32. Sales representative Z.A. further advised that the female was accompanied by two unidentified males but that the female completed all the paperwork. Z.A. recalled the female had a tattoo near her left eye and additional tattoos on her hands/knuckles. I reviewed booking photos for Sanchez and confirmed that she had tattoos on her hands and one near her left eye.
33. Law enforcement then conducted a photo lineup for Z.A, and he/she positively identified Sanchez as the female that purchased the Audi A4 (7XPY170). Z.A. was unable to identify the males that accompanied Sanchez on May 18, 2020.

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Federal Search Warrant 2:20-SW-0523

34. On June 8, 2020, USPIS obtained Federal Search Warrant 2:20-SW-0523 (E.D. Cal.) for the cellphone recovered from Sanchez, and a forensics team was able to access the cellphone pursuant to the warrant. A review of the cellphone's files identified the cellphone's phone number as (925) 354-9287. The cellphone also contained items indicating the phone was used by Sanchez, including photos of Sanchez, voicemails for Sanchez, and an outgoing text message that stated: "Hi sir this is desiree sanchez calling to check in please call me back at your earliest convenience." Images of Sanchez with Waters and suspect R.J. were also on the phone.
35. USPIS also identified phone numbers, photos, text messages and social media accounts associated with Waters and suspect R.J. R.J.'s Facebook account was identified by the screenname Pa Ji and the username rxxxx.pajijxxxxx (partially redacted). Pa Ji was also associated with the phone number (925) 434-4522 in the phone's contacts. The phone number (925) 856-3111 received or made calls more than 600 times to/from (925) 354-9287 (i.e., the number associated with Sanchez's cellphone). Waters's Facebook name was Richard Waters and his username was blu.waters.925. The phone number listed on the phone for Blu was (925) 303-6999. This phone number received or made calls from/to (925) 354-9287 more than 100 times. Another number associated with the alias "Blu," (925) 726-1670, received or made calls from/to (925) 354-9287 in an excess of 45 times.
36. During a further review of the cellphone, USPIS identified text messages between R.J. (925-856-3111) and Sanchez (925-354-9287) on or about April 1, 2020 to May 9, 2020. These messages including at least the following statements:
- R.J. asked Sanchez to go "mailbox with me";
 - Sanchez asked R.J. to cash checks for her;
 - Sanchez provided addresses for R.J. to go to in Folsom, CA and R.J. responded: "Two bags so far. I'm going for 10";

- R.J. told Sanchez that he has “the Folsom key”;
- Sanchez directed R.J. to place the “mail” in the closet of her room;
- Sanchez wrote that they were going to “get a room to go mailboxing” and R.J. responded with “Awesome, My favorite!”;
- Sanchez wrote to R.J., “I fucked up this check I was making.”

Based on my training, experience and conversations with other law enforcement personnel, I am aware that the term “mailboxing” is used by mail thieves to define the act of stealing U.S. Mail from mailboxes. Additionally, I recognize the above text exchange to refer to Sanchez’s participation in U.S. Mail theft and check fraud.

37. During a further search of Sanchez’s cellphone, USPS identified text messages between (925) 726-1670 and someone identifying themselves as “Blu.” Based on my review of evidence in this investigation, I determined that Blu was a known alias for Waters. For example, California Department of Corrections have the moniker of Blue associated with Waters. On April 11, 2020, Sanchez texts: “I actually need to drop my truck off to paji so he can go out mailboxing for me tonight would you like meet me there and pick me up whenever your done.” As discussed above, I determined that Paji was a known alias for suspect R.J. I also identified the following text messages among these perpetrators:

- April 12, 2020, Waters to Sanchez: “Oh shit I think it is. Does she have a mark next to her eye?”
- Sanchez responded: “Yeah she has a money sign like mine.”
- April 15, 2020, Sanchez to Waters: “Paji wants to go mailboxing so hes gunna leave from the west... if your tired feom work n shit I can have calvin take me home.”
- April 18, 2020, Sanchez to Waters: “So like ima go get a room out in Sacramento tonight so paji can go mailboxing n shit are you gunna come through before I leave?”

- April 25, 2020, Sanchez to Waters: “SO I got an approval for this other acura and there gunna deliverit to me in folsom.”
- Waters responded: “Aite. We’ll go back.”

38. Also, on April 25, 2020, Waters and Sanchez exchanged the following text messages when it appears that Sanchez was attempting to complete a transaction at a car dealership:

- Waters: Well walk out if u feel u need to aite but it lookds good out here.messages
- Sanchez: Alright
- Sanchez: If I go to jail for getting your car right now you better get garys carvn pick me up when I get out
- Sanchez: lol
- Sanchez: Knock on wood for me one time
- Sanchez: Sorry its taking so long they got my approval and shit they said its gunna take a couple more minutes to sign all the documents n shit
- Waters: Ur stupid but I gotcha lol aite
- Sanchez: Seeing if they trip on the check is the part where it can go wrong and that’s the last thing so well see what happens
- Waters: Itll be good
- Sanchez: Can you ask sav to get me a blank envelope to put this check in and ill be out in a secord.to grab it
- Sanchez: Please
- Waters: She’s looking rn
- Sanchez: k
- Waters: She found one
- Sanchez: See this is where it probably is gunna go bad dude
- Waters: it won’t thoe
- Sanchez: He just took the check to the bank dude

- Waters: Oh shit. Let's go or wat
- Sanchez: I dk I don't want to tho cause I need to go to folsom
- Waters: Well will it clear or wat
- Sanchez: it's a good account but it just wont scan cause its not magnetic ink
- Waters: So is this a waste of time?
- Sanchez: I don't know blu this shit is hit or miss dog like ima just take an uber to folsom if it doesn't work
- Waters: It's all good. Wat Evers cleaver
- Sanchez: im hea annoyed right now
- Sanchez: Like ive never had a dealership do this before
- Waters: Y. U wanna get dropped off
- Waters: Come on

39. I also recovered additional text messages on Sanchez's cellphone showing that R.J. was "mailboxing" with Sanchez's knowledge or direction.
40. I also recovered an additional text message on Sanchez's cellphone dated May 8, 2020, where a contact named "Jamsie" asked Sanchez if she could do anything with stimulus checks. That same contact also asked Sanchez a few days earlier if she could make her a fake "bike license" so she could conduct a test ride in Sacramento.
41. During a further search of Sanchez's cellphone, USPIS identified items of evidentiary value relating to the May 1, 2020, purchase of the Infiniti G35 (7HEK402). For example, the phone contained an e-mail message dated April 30, 2020, from queensautosales18@gmail.com to antoinettejimenez022@gmail.com that read, "2008 Infiniti G35 for 8500 silver; It's available. We can use your Westlake approval to get you on this car. You can reach me at 9169032761 I'm Tanya."
42. Among the images on Sanchez's phone, I identified additional items of evidentiary value relating to the Infiniti G35 purchase on May 1, 2020. Among them were: a paystub from 24-hr Fitness in the name of victim A.J., dated 4/17/2020, at the address of 4174 Richard

PL, Pittsburg, CA; a counterfeit CA driver's license in the name of victim A.J.; a Progressive Insurance document for a 2017 Audi A4 with VIN ending x41413; and handwritten notes for A.J. including a true DOB, SSN and DL Number. The below counterfeit ID contains victim A.J.'s true DL and DOB. However, the address, eye color, photo, height/weight and expiration date do not match California DMV records. This counterfeit ID is show below (partially redacted), and the headshot, for example, is actually a photo of Sanchez:

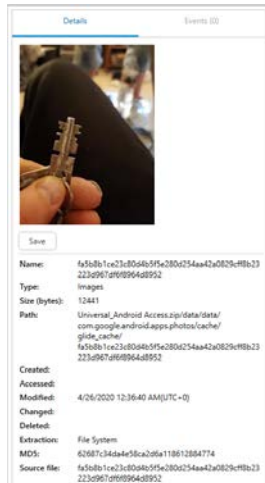


43. Sanchez's cellphone also contained images of additional victim names, such as J.M. and A.G., with the same vehicle information. Also recovered was an image of a Progressive Insurance document in the name of victim M.D. for a 2017 Lexus IS 200t, VIN ending x41413.
44. During a further search of Sanchez's cellphone, USPIS found additional items of evidentiary value relating to the purchase Audi A4 (7XPY170) on May 17, 2020, including:
 - An email addressed to feliciav1987@gmail.com from Radaris stating, "Advanced People Search on [victim A.G.] is now available.";
 - An e-mail from Google regarding finalizing a google account for gxxxxxxaxxxxx@gmail.com (partially redacted);

- An e-mail message from Honda of Serramonte Employee Z.A. regarding the dealership being open to appointments only and thanking A.G. for inquiring about a 2017 Audi A4;
- A thank you for signing up from Experian e-mail message all dated on May 17, 2020;
- A May 18, 2020, email to A.G. at gxxxxxxaxxxxx@gmail.com (partially redacted) from Honda of Serramonte to complete a survey regarding her buying experience for an Audi A4 at Honda of Serramonte;
- A photo of a 24hr Paystub in the name of victim A.G.;
- A photo of a paystub from Comcast Communications in the name of victim A.G.;
- A photo of Progressive Insurance information in the name of victim A.G. for a 2017 Audi A4;
- A photo of a California driver's license in the name of victim A.G. (CADL F1838883), as show below (partially redacted):



- A photo of a Honda of Serramonte "Internal Use Document" in the name of A.G., dated 5/17/2020, for a 2017 Audi A4 in the amount of \$21,155.85;
- Photos of counterfeit U.S.P.S. arrow keys, as show below:



45. Based on my training, experience and conversations with other law enforcement personnel, I am aware that counterfeit U.S.P.S. arrow keys are used to access neighborhood/apartment mailboxes without damaging the boxes. Two such keys were recovered by El Dorado County Sheriff Deputies on May 18, 2020, in the Audi A4 with California license plate 7XPY170.
46. A further review of Sanchez's cellphone uncovered additional images of PII likely used for identity theft including handwritten notes, driver's license numbers and names, Social Security Numbers, dates of birth, counterfeit/true identification documents, and multiple images of personal and business checks. The total dollar amount of the checks stored in the images on the cellphone was over \$45,000.
47. A further review of Sanchez's cellphone uncovered additional images of multiple counterfeit identification documents that contained Sanchez's photograph. Although these identification documents contained photos of Sanchez, they also contained following victim names that were lined to the photo: A.J., A.F., S.S., K.G., K.F., K.B., M.W., F.V., N.D., and L.G. I also identified images of true ID documents and a blank template for a California Driver's License, as shown below:



Stockton Police Department Report C-20-0518-01

48. On or about June 25, 2020, Sanchez fraudulently posed as identity theft victim K.P. and used his/her personal and financial information to apply for vehicle financing to obtain a Hyundai Genesis at the Stockton, CA Hyundai dealership.
49. On or about June 25, 2020, a female completed a fraudulent credit and finance application for the purchase and financing of a Hyundai Genesis G80 at the Stockton, CA Hyundai dealership. In completing the application, she provided the true name, address, date of birth, California driver's license number and Social Security number of victim K.P. of San Ramon, CA. She also provided a signature in the name of the victim on multiple occasions during the credit application and financing process. The fraudulent application, which was also subjected to a credit check through Experian via an electronic wire, was approved. Based on the fraudulent application, Hyundai gave the female vehicle financing valued at \$53,495. On that same day, the female completed the purchase and financing of the Hyundai and drove off the lot with it. The female was accompanied by an unidentified male.
50. During the above-described transaction, the female provided the dealership with an inked fingerprint at the time of sale of the Hyundai Genesis G80 for the purpose of fraud prevention. Law enforcement analyzed this fingerprint and compared it to known fingerprints including that of Sanchez. This analysis confirmed that Sanchez was the female who provided the fingerprint during the transaction.

51. Sanchez committed these acts without the victim K.P.'s knowledge or permission. Stockton PD later contacted K.P. and he/she confirmed he/she did not give anyone permission to have his/her social security number or driver's license. K.P. reported the woman on the identification was not him/her.

Sonoma County Sheriff's Office Report SD200829013.0

52. On August 29, 2020, a Sonoma County Sheriff's Office (SCSO) Deputy observed a dark grey Mercedes traveling northbound on Highway 12 in Boyes Hot Springs, CA. The Mercedes's license plate was obscured by a tinted plastic cover in violation of California Vehicle Code Section 5201.1(b). SCSO also observed that the Mercedes was driving above the speed limit. SCSO conducted a traffic stop on the Mercedes near the Fairmont Hotel, located at 18140 Hwy 12, Boyes Hot Springs, CA, and a pursuit occurred after the vehicle entered a roundabout in front of the Fairmont Hotel and continued for approximately 100 yards after the roundabout. SCSO contacted the driver who identified himself as Gary Waters. This was the same name that Richard Waters provided EDCS deputies on May 18, 2020.
53. Waters claimed to not have a driver's license on his person and to not be on probation or parole. SCSO detained Waters while his identity could be confirmed and requested consent to search Waters' person. Waters then correctly identified himself, admitted he had identification in his pocket, and confirmed he was on parole. SCSO then searched Waters's person and recovered credit cards in names other than Waters and a Fairmont Hotel room key.
54. SCSO contacted the passenger who initially identified herself as victim A.G. with a matching driver's license number and date of birth. SCSO then determined that A.G. was on felony probation out of San Joaquin County. A copy of an interim driver's license in this name was recovered during the FPD investigation on May 11, 2020. This was also the name that was used to purchase the Audi A4 in Coloma, CA, on May 17, 2020. It was also the name that Sanchez provided to EDCS deputies on May 18, 2020. Further, a

photograph of a counterfeit California driver's license in this name was recovered from the phone possessed by Sanchez during the execution of Federal Search Warrant 2:20-SW-0523 (E.D. Cal.).

55. Later during the booking process, SCSO compared a true California Driver's License photo of A.G. to Sanchez and was able to confirm that Sanchez was not A.G. When Sanchez was confronted with this information, she provided her true name and date of birth.
56. SCSO conducted a probation/parole search on the Mercedes. During the search, they identified additional debit/credit cards in names other than Sanchez and Waters, handwritten notes with additional account numbers/credit card numbers, and DMV paperwork containing the same female photo in the corner but with different names and identification numbers. In addition, a Fairmont Hotel room key was recovered from under the passenger seat of the vehicle. A leather purse in the Mercedes contained a driver's license, credit card, and a check made payable in the name of C.D.
57. Sanchez and Waters claimed they were going to the hotel to visit a friend. Hotel employees reported that Waters checked into room 917 on August 26, 2020, and paid with a credit card issued in his name. A copy of the room bill was provided to law enforcement. SCSO confirmed the hotel cards recovered in the Mercedes and from Waters's person accessed room 917.
58. SCSO then conducted a probation/parole search of room 917 at the Fairmont Hotel. During the search, they found five 30-gallon plastic garbage bags containing multiple pieces of U.S. Mail; several bank cards and means of identification in other persons' names; multiple counterfeit U.S.P.S. arrow keys in various stages of completion; and U.S.P.S. locks. In addition, SCSO observed a Dremel tool and a template and other tools used for making counterfeit U.S.P.S. arrow keys. As discussed above, similar keys were recovered during Sanchez and Waters's arrest on May 18, 2020 by EDSO deputies.

Similarly, photographs of similar keys were found during the execution of Federal Search Warrant 2:20-SW-0523 (E.D. Cal.).

59. During the room search, SCSO also recovered a laptop computer with a laser printer and approximately 150 checks that appeared to have been stolen for U.S. Mail. The checks were primarily business checks and from areas all over the San Francisco Bay Area.
60. During the room search, SCSO also found a temporary paper driver's license and a credit card in the same name. The photo on the temporary license was the same as the temporary licenses recovered from the vehicle. The photo on the interim driver's licenses is similar in appearance to counterfeit identification documents recovered from Sanchez's phone during the execution of Federal Search Warrant 2:20-SW-0523 (E.D. Cal.).
61. During the room search, SCSO also located a backpack that contained a notebook. Handwritten notes within the notebook documented detailed instructions on how to create and print fake identifications, including font size and instructions on how to print counterfeit checks with routing numbers for multiple banks. The notes included diagrams of checks and identification documents.
62. On August 30, 2020, SCSO responded to the Fairmont Hotel regarding a gun found on the property. The gun was recovered by Fairmount employees in a planter island on the south side of the east-west driveway between the roundabout and the parking garage. The gun was recovered with a round in the chamber, but without a magazine. SCSO searched the area where the weapon was recovered and found a magazine that was compatible with the weapon. SCSO also reviewed video surveillance of the evening prior to the traffic stop of Sanchez and Waters during which their Mercedes passed by the planter island during the pursuit. On April 1, 2020, Sanchez texted with suspect R.J. and asked, "get the banger out the car plz underneath the seat." Based on my training, experience and conversations with other law enforcement and common sense, I know "banger" can be a reference to a firearm.

CONCLUSION

63. For the reasons stated above, there is probable cause to believe that Desiree Brianna Sanchez and Richard Beldon Waters III committed a violation of 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States, wherein such offenses include theft of U.S. Mail and possession of stolen U.S. Mail in violation of 18 U.S.C. § 1708, and making and possession of counterfeit U.S. Postal Service keys in violation of 18 U.S.C. § 1704, during the time period of approximately April 2020 through August 2020.

/s/ Patrick Mahoney


Patrick Mahoney
Postal Inspector
United States Postal Inspection Service

Approved as to form.



Robert J. Artuz
Special Assistant U.S. Attorney

Subscribed and sworn to me telephonically on the 6th day of November, 2020.



KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE